Similarly, and again because of Belo's journalistic tradition and its commitment to news and informational programming, WFAA-TV has become an established leader among broadcasters in the Dallas-Fort Worth market. WFAA-TV currently provides the highest amount of news and other non-entertainment programming of any of the network-affiliated stations in its market.[32] Thus, the station currently airs, on average, 47 hours of local and national newscasts, 25.5 hours of news/information programs (e.g., news "magazines" and morning news programs), and a total of 81.5 hours of non-entertainment programming each week.[33] Moreover, like Belo's other television stations, and as described in more detail above, WFAA-TV produces and airs "It's Your Time," a commercial-free television series providing free time for statements by candidates for public office.

WFAA-TV has been ranked as the number one station in its market for the past fifteen years, and the station's reputation for superior journalism has been recognized through numerous awards, including five duPont-Columbia awards and a George Foster Peabody award. In 1995, WFAA-TV's 10 o'clock news was the highest-rated late newscast of any top-ten market station based on an average of the four Nielsen rating periods.[34] In the fall of 1994, moreover, WFAA-TV launched "Good Morning Texas," a live morning program consisting of

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[32] See Non-Entertainment Programming Study (A.H. Belo Corporation) 1998. As noted above, non-entertainment programming consists of newscasts, news/information programs, public affairs shows, instructional programs, children's/educational programming, and religious programs.

[33] Id. In addition to the 44.5 hours of newscasts recorded in the Non-Entertainment Programming Study, WFAA-TV has recently begun broadcasting another half-hour week-day newscast.

[34] Dallas-Fort Worth is currently ranked as the 8th largest television market in the United States. Television & Cable Factbook, A-1 (1998).

information, talk, and entertainment specifically aimed at its Texas audience. "Good Morning Texas" has been a consistent ratings winner since its premiere. Thus, the consistent records of outstanding service -- and audience acceptance -- that have been provided by WFAA-TV and The Dallas Morning News confirm the findings of the study noted by the Commission in 1975 that cross-owners typically provide superior programming service, refuting arguments that prohibiting such cross-ownership somehow serves the public interest.

C. WFAA-TV and The Dallas Morning News Have Consistently Maintained Separate Operations with Distinct Editorial Voices and Have Every Incentive to Continue to Do So

During the Commission's 1975 proceedings, a number of parties who jointly-owned a daily newspaper and a broadcast television station within the same market offered the Commission detailed explanations of their strong incentives to maintain significant diversity or separation of operation between their media outlets.[35] Most of the parties to the proceeding "state[d] that their broadcast stations and newspapers ha[d] separate management, facilities, and staff, including news and advertising staffs (which compete with each other for advertising)...."[36] Some of these owners even provided the Commission with examples in which, as a result of their independent editorial operations, they presented editorials in one media outlet which were opposed through the other outlet.[37] These rationales continue to hold true today. Thus, because cross-owners such as Belo would -- without governmental

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[35] 1975 Multiple Ownership Report, 50 FCC 2d at 1059-60.

[36] Id. at 1059.

[37] Id.

intervention -- be motivated by journalistic principles and marketplace forces to maintain independent and competitive operations, Belo submits that the newspaper/broadcast cross-ownership rule has done little if anything to advance the "hoped for gain in diversity" that was the underpinning of the Commission's decision to adopt the rule in the first place.[38]

First, as was pointed out by parties to the 1975 proceedings, strong traditions of journalistic professionalism and the development of industry practices and codes of ethics have resulted in highly independent staffs operating even commonly owned media outlets.[39] Indeed, a primary tenet of any well-respected journalistic organization -- including Belo -- is that reporters must be afforded wide discretion and independent judgment in the presentation of news stories. Thus, any effort to stifle journalistic independence in order to unify the editorial voices of commonly owned media entities certainly would not be tolerated by professional print or broadcast journalists.

Commonly-owned newspapers and broadcast stations also generally have very divergent methods of organizing and presenting news and information. Because television news tends to be very concise and headline-focused, while newspapers typically expand on details and offer more comprehensive coverage of stories, there is generally little economic or practical incentive to merge these two distinctive types of presentation. In addition, business incentives serve to discourage newspaper publications and broadcast stations within the same market from integrating their operations. Publishing and broadcasting are fundamentally different businesses, and local newspapers and television stations each must compete intensely

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[38] Id. at 1078.

[39] Id. at 1060.

in their own spheres for audiences and to build advertiser patronage. Thus, economic forces further drive newspapers and broadcast stations to maintain separate editorial voices. The efficacy of these journalistic traditions and economic incentives is well-illustrated by the highly independent editorial operations of WFAA-TV and The Dallas Morning News. Although the two entities share resources such as the above-described news bureaus, they operate as separate businesses, and there is no ongoing editorial coordination between the newspaper and the television station.

V. BECAUSE THEIR COMPETITORS ARE FREE TO TAKE ADVANTAGE OF THE OPERATIONAL SYNERGIES AND ECONOMIES OFFERED BY CROSS-MEDIA RELATIONS, THE NEWSPAPER/BROADCAST CROSS-OWNERSHIP RULE UNFAIRLY SINGLES OUT NEWSPAPER PUBLISHERS AND BROADCAST STATION LICENSEES

Notwithstanding the recognized benefits of common ownership, newspapers and television broadcast stations within the same market continue to be precluded from realizing the synergies and public interest benefits associated with cross-ownership. When the newspaper/broadcast cross-ownership ban was adopted in 1975, however, the restriction was merely one of several similar rules preventing common ownership of more than one type of media outlet in the same market.[40] Today's media marketplace is vastly different from what existed in 1975. Indeed, the changing media marketplace has caused both Congress and the FCC to re-evaluate the validity of many of the rules that existed at that time, resulting in a

[40] See FCC v. Nat'l Citizens Comm. for Broadcasting, 436 U.S. 775, 801 (1978). In fact, in upholding the newspaper/broadcast cross-ownership ban, the Supreme Court noted that "owners of radio stations, television stations, and newspapers alike are now restricted in their ability to acquire licenses for co-located broadcast stations." Id.

substantial decrease in the number of ownership regulations that remain in full force.[41] This has left newspaper owners and broadcast licensees virtually alone in being absolutely barred from cross-ownership.

Recognizing the declining validity of the Commission's cross-ownership restrictions in today's vastly diverse media marketplace, Congress called for the most sweeping overhaul of those restrictions to date with the passage of the Telecommunications Act of 1996. In enacting the 1996 Act, Congress sent a clear message that "[i]n a competitive environment, arbitrary limitations on broadcast ownership and blanket prohibitions on mergers or joint ventures between distribution outlets are no longer necessary."[42] In addition, Congress expressly mandated in the 1996 Act that the FCC eliminate, relax, or review many of its ownership restrictions, directing a detailed re-examination of the validity of such rules in light of the changed media marketplace.

For example, the Act required the Commission to repeal the cable-telephone cross-ownership ban, which, like the newspaper/broadcast cross-ownership ban, was an absolute bar to joint ownership.[43] The Act also mandated relaxation of the radio and television multiple ownership rules,[44] elimination of the broadcast/cable cross-ownership ban,[45] and extension of

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[41] See NAA Comments at § VII(C).

[42] H. R. Conf. Rep. No. 104-204, pt. 1, at 55 (1995).

[43] Telecommunications Act of 1996, Pub. L. No. 104-104, § 202(i), 110 Stat. 56, 112 (1996).

[44] See Telecommunications Act of 1996, §§ 202(a)-(c), 110 Stat. at 110-11; Broadcast Radio Ownership, 11 FCC Rcd 12368 (1996) (Order) (eliminating numerical limitations on national radio ownership); National Broadcast Television Ownership and Dual Network Operations, 11 FCC Rcd 12374 (1996) (Order) (eliminating numerical restriction on national television ownership and raising audience reach limit to 35 percent).

the one-to-a-market waiver policy to the top fifty markets.[46] In directing the FCC to eliminate or relax many and undertake a searching reconsideration of all of its mass media ownership restrictions, Congress explicitly recognized that a tremendous level of competition and diversity exists in the marketplace and that these outdated restrictions are no longer necessary.[47]

Even before the agency was prodded to relax or eliminate its ownership restrictions by the Telecommunications Act of 1996, the Commission itself had recognized in numerous agency proceedings that rigid restrictions on multiple ownership of media outlets are no longer necessary, given the tremendous increase in the number of media outlets available to the public. In its 1992 decision to relax its radio multiple ownership rules, for example, the Commission noted that "the intense inter- and intra-industry competition has produced an extremely fragmented [media] marketplace in which existing and future . . . broadcasters will be subject to increasingly severe economic and financial stress."[48] Similarly, in relaxing its waiver policy associated with the one-to-a-market rule, the FCC found in 1989 that

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(...Continued)
[45] Telecommunications Act of 1996, § 202(f)(1), 110 Stat. at 111.

[46] Telecommunications Act of 1996, § 202(a), 110 Stat. at 110.

[47] See H. R. Conf. Rep. 104-204, pt. 1, at 54-55 ("The audio and video marketplace . . . has undergone significant changes over the past fifty years and the scarcity rationale for government regulation no longer applies. . . . There is also competition from cable systems as suppliers of video programming. . . . [and] other technologies such as wireless cable, low power television, backyard dishes, satellite master antenna television service (SMATV) and video cassette recorders (VCRs) provide consumers with additional program distribution outlets.").

[48] 1992 Revision of Radio Rules and Policies, 7 FCC Rcd at 6387.

"circumstances have changed substantially in the eighteen years since [the rule was adopted]" and that its "diversity concerns have become somewhat attenuated since [that time]."[49] The Commission correctly found that "there has been a dramatic increase in the number of media outlets in markets of all sizes, which has enhanced both viewpoint and programming diversity on a local level. In large markets, the degree of diversity is tremendous."[50]

The combined Congressional and FCC initiatives to relax media ownership restrictions have left newspapers and broadcast station licensees alone among major media sources facing a "per se" ban on cross-ownership. Indeed, unlike cable and programmers, DBS, SMATV, and wireless cable service providers, local and long distance telephone companies, on-line services (e.g., America On Line, Prodigy), software providers (e.g. Microsoft), magazine publishers, and direct mailers, only newspaper publishers are barred entirely from owning local broadcast stations. Moreover, numerous other types of media combinations are entirely permissible, including the following:

- cable/radio
- cable "clustering" (ownership of multiple systems in adjacent areas)
- wireless cable/broadcast
- wireless cable/telco
- on-line services (America On Line, Prodigy)/cable
- on-line services/telco

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[49] Amendment of Section 73.3555 of the Commission's Rules, the Broadcast Multiple Ownership Rules, 4 FCC Rcd at 1744.

[50] Id.

- on-line services/broadcast
- software providers (Microsoft)/cable
- software providers/telco
- software providers/broadcast
- software providers/newspaper
- telco/newspaper
- telco/broadcast
- telco/DBS
- DBS/broadcast

While all of the above entities have an unrestricted right to form co-located cross-ownerships, the Commission has been entirely inflexible in banning the cross-ownership of newspapers and broadcast stations. Indeed, the agency has granted only three permanent waivers of the rule in the more than twenty years since its adoption -- all in extremely unusual circumstances, under an antiquated standard originally adopted in connection with the requirement for divestiture by sixteen "egregious" cross-owned combinations.[51] The rule has been rigidly applied without regard to the specifics of the properties involved or the circumstances of the local marketplace.[52]

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[51] Field Communications Corporation, 65 FCC 2d 959 (1977); Fox Television Stations, Inc., 8 FCC Rcd 5341 (1993), aff'd sub nom. Metropolitan Council of NAACP Branches v. FCC, 46 F.3d 1154 (D.C. Cir. 1995); Columbia Montour Broadcasting Co., FCC 98-114 (rel. June 11,1998).

[52] For example, in Capital Cities/ABC, Inc., the Commission denied the request of the Walt Disney Company ("Disney") for permanent waivers for newspaper/radio combinations in the Dallas-Fort Worth and Pontiac-Detroit markets. 11 FCC Rcd 5841, 5895 (1996).

(Continued...)

Thus, despite their acknowledged qualifications, newspaper publishers are precluded from seeking to acquire same-market broadcast properties, and station owners are eliminated as potential newspaper publishers. Belo's publication of The Press Enterprise, a daily newspaper serving Riverside County and the inland Southern California area, provides an illustrative case in point.[53] Combining the resources of that newspaper with those of a local television station could enable both to provide a higher level of service to Riverside and, perhaps, to compete more vigorously in the greater Los Angeles market. Because virtually all of the television stations in the Los Angeles market produce Grade A contours that encompass Riverside,[54] however, the current letter of the rule effectively prohibits Belo from acquiring any of the stations within this expansive market. Indeed, Belo is barred from acquiring a broadcast station in any of its other newspaper markets, or a daily newspaper in any of the sixteen

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(...Continued)
Notwithstanding Disney's detailed showing of the high levels of diversity and competition in these markets and the recognition of the need for a "full review" of the rule, the Commission granted Disney only a temporary waiver. Id. at 5881, 5888. Just five months later, the FCC denied a similar waiver request by Tribune Company ("Tribune"). Stockholders of Renaissance Communications Corp., 12 FCC Rcd 11866 (1997). Tribune, which publishes the Fort Lauderdale, Florida Sun Sentinel, sought a permanent waiver to permit the acquisition of WDZL(TV), a UHF television station licensed to Miami. The agency rejected Tribune's request, "despite the existence of a number of competing media voices in the South Florida market" and Tribune's specific proposals to augment the news and information programming of the television station involved, concluding once again that "an open proceeding, rather than a restricted adjudication is the better forum to address [the] issues [raised in support of the waiver]." Id. at 11886, 11888.

[53] The circulation of The Press Enterprise of 162,551 for morning editions and 170,478 for Sunday editions is modest in comparison to that of market's largest daily newspaper, the Los Angeles Times, which currently boasts a morning circulation of 1,050,176 and a Sunday circulation of 1,361,748. Editor & Publisher International Yearbook at I-36, I-45 (1998).

[54] Television & Cable Factbook, A-128 to A-143 (1998).

markets (other than Dallas) in which it owns a television station. Moreover, even in the event that it might be able to persuade the Commission to grant a waiver of the cross-ownership rule, the Company's opportunity to purchase a broadcast station -- or to acquire a newspaper in one of its existing stations' markets -- would in all likelihood be barred by the typical seller's reluctance to deal with a party who must confront the obstacles imposed by the cross-ownership ban.

Newspaper owners and broadcasters are placed at a marked disadvantage in their ability to compete in the diverse and ever-expanding multimedia market of the late 1990s because of their inability to operate under joint ownership and take appropriate advantage of the recognized benefits from economies of scale.[55] The restriction also disserves the public: Belo submits that the increase in available resources from the economic efficiencies associated with common ownership can and would result in increased public interest programming and greater diversity. Indeed, both the agency and Congress have recognized that cross-ownership between other categories of media owners benefits both competition and diversity. As demonstrated herein, there is no legitimate public interest rationale for perpetuating this discriminatory treatment of newspapers and broadcasters.

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[55] Although separately owned newspapers and broadcasters are entitled to combine their resources through certain joint venture agreements, joint ventures have a limited ability to achieve efficient joint production because of the difficulties and costs involved in agreeing on the scope and nature of operations and the differing incentives of independently owned partners with different "core" businesses.

VI. AN ANALYSIS OF THE DALLAS MEDIA MARKETPLACE DEMONSTRATES THAT THERE IS NO LEGITIMATE REASON TO BELIEVE THAT OPENING MARKETS TO THE CROSS-OWNERSHIP OF NEWSPAPERS AND BROADCAST STATIONS WILL HAVE A NEGATIVE IMPACT ON COMPETITION

As the NAA has amply demonstrated both in its Petition for Rulemaking and in the comments the organization is submitting today in the instant proceeding, the mass media marketplace has undergone a dramatic transformation since the newspaper/broadcast cross-ownership rule was first implemented in 1975.[56] Over the past two decades, the traditional forms of mass media outlets -- newspaper publishing and radio and television broadcasting -- have grown at an exponential rate, both in terms of the sheer number of voices available and in the accessibility of a rich variety of programming formats. Cable has grown from a "community antenna" service to the dominant vehicle for delivery of video programming.

There have also been an extraordinary number of new media entrants in recent years, including videocassettes, direct broadcast satellite service, wireless cable, SMATV, DARS, and the Internet. Not only are these new media significant alternative outlets for the dissemination of information, but they also have evolved into legitimate competitors to the longer-established media in the contest for audience members and subscribers as well as the scramble for advertising dollars -- erasing any realistic prospect that a newspaper/broadcast combination could adversely impact diversity or competition in the local marketplace.

Whatever merit the cross-ownership ban may have had in 1975, it can no longer be seriously questioned that the exponential increase in the level of diversity and competition in

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[56] See NAA Petition at § V; NAA Comments at § VI.

the information marketplace has wholly eroded the FCC's original justification for the policy. Indeed, in numerous proceedings since the implementation of the newspaper ban, the Commission itself has repeatedly acknowledged the vast expansion in the media marketplace, as well as the positive impact of that expansion on diversity.[57]

That the combined ownership of a daily newspaper and a television station within a local market can hardly impede the explosion of diversity that has occurred in the information marketplace is amply demonstrated by Belo's experience in the highly competitive Dallas-Fort Worth market. Despite the continuous common ownership of The Dallas Morning News and WFAA-TV, the Dallas-Fort Worth market remains robustly diverse and competitive.

In 1996, in Capital Cities/ABC, Inc., the Walt Disney Company ("Disney") documented the impressive diversity of media voices in this market.[58] In that case, the Commission denied Disney's request for a permanent waiver to permit retention of a newspaper/radio combination, instead granting the company only a temporary waiver and vowing to conduct a "full review" of the rule in a separate proceeding.[59] In connection with its waiver request, Disney compiled and presented detailed data regarding the high levels of

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[57] For example, as early as 1984, the Commission recognized that for purposes of mass media diversity the market includes "not simply television and radio, but also cable, video cassette recorders, newspapers, magazines, books, and when they are in operation, MDS, STV, LPTV, and DBS." Amendment of Section 73.3555 of the Commission's Rules Relating to Multiple Ownership of AM, FM and Television Broadcast Stations, 100 FCC 2d 17, 30 (1984) (Report and Order). Several years later, the Commission concluded that the fairness doctrine infringed on the First Amendment right of television broadcasters in light of the "explosive growth in the number and types of information sources available in the marketplace." Syracuse Peace Council v. WTVH, 2 FCC Rcd 5043 (1987).

[58] Capital Cities/ABC, Inc., 11 FCC Rcd 5841, 5881 (1996).

[59] Id. at 5888, 5895.

competition among media outlets in the Dallas-Fort Worth area. Petitioners showed, for example, that there were a total of 87 broadcast stations in the Dallas-Fort Worth area, 69 of which were separately owned.[60] In addition, Disney demonstrated that the area was served by nineteen daily newspapers as well as numerous national magazines and weekly newspapers.[61] It was further shown that the cable penetration rate was 49.1% and that the market was served by a number of wireless cable (MDS/MMDS) operators.[62] In response to these showings, Commissioner Quello in a separate statement identified the Dallas-Fort Worth market as "among most diverse in the country."[63]

The Dallas-Fort Worth market has only become more diverse and competitive since Disney made these showings in 1996. While newspapers now account for less than one third of the Dallas market's advertising revenue, there are currently over fifty publications competing for that share of the market.[64] Among these newspapers are a number of national publications, such as The Dallas Business Journal, which have begun to target the Dallas market's national advertising revenue by offering the opportunity to advertise simultaneously in a number of "sister publications" in other markets. Moreover, the cable penetration rate in

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[60] Id. at 5881.

[61] Id. at 5912 (separate statement of Commissioner Quello).

[62] Id. at 5881.

[63] Id. at 5912 (separate statement of Commissioner Quello).

[64] See 1998 Ad Audit Report for the Dallas PMSA (1998); Dun & Bradstreet MarketPlace, July-September, 1998. Figures are based on the Dallas Primary Metropolitan Statistical Area ("PMSA"), which consists of eight counties (Collin, Dallas, Denton, Ellis, Henderson, Hunt, Kaufman, and Rockwall).

the Dallas-Fort Worth market has risen to 52 percent.[65] In addition to these more traditional types of media, the market now offers 32 web outlets. Over 250 direct mail advertising and outdoor advertising services also compete for the market's advertising dollars.[66]

In short, despite Belo's ownership of a leading daily newspaper and a strong commercial television station in the Dallas market, the market is unquestionably served by an abundance of mass media competitors. Belo's experience as a grandfathered cross-owner thus confirms that elimination of the newspaper/broadcast ban would not inhibit the explosive growth of diversity that has characterized the mass media marketplace since the Commission's adoption of the newspaper/broadcast cross-ownership rule in 1975. On the contrary, as demonstrated above, repeal of this anachronistic prohibition would free Belo and others to bring the benefits of their experience and resources to bear to provide improved broadcast news and informational services and to develop innovative new services and alternative media products to add to the already extensive diversity of the marketplace.

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[65] Broadcasting & Cable Yearbook, C-3 (1998).

[66] Dun & Bradstreet Marketplace, July-September, 1998.

VII. CONCLUSION

For the reasons set forth above, Belo urges the Commission to initiate a rulemaking proceeding to repeal the newspaper/broadcast cross-ownership ban in its entirety. The rule is an anachronistic relic of an outdated regulatory regime which is plainly unnecessary in the current mass media environment and serves only to handicap publishers and broadcasters in their efforts to compete effectively in the multi-channel marketplace of the late 1990s.

Respectfully submitted,

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July 21, 1998

APPENDIX A

Non-Entertainment Programming Study

BELO

"The FCC could require that a reasonable percentage of digital television – 5% – be set aside for public-interest programming."

– Former FCC Chairman Reed E. Hundt

"The Hard Road Ahead – An Agenda for the FCC in 1997" December 26, 1996

"Five percent of the programming time for a digital TV license . . . [t]his is a very substantial number."

–Former FCC Chairman Reed E. Hundt

Speech prepared for American University/TCI News Symposium, National Press Club Washington, D.C.
May 23, 1996

ABOUT THE STUDY

- The following tables are designed to show the amount of time devoted each week to the broadcast of non-entertainment programming by the seventeen full-service television stations owned and operated by Belo and its subsidiaries. The tables also include corresponding combined totals for the ABC, CBS, NBC, and FOX affiliates in each of the Belo markets.[1]

- Program Categories:
  - Newscasts: network and local newscasts (not including the news update segments of other news/information programming).
  - News/Information: news "magazines," morning news programs, and prime time news programs, such as "Good Morning America" and "Dateline NBC." (Tabloids and talk shows, such as "Hard Copy," "Entertainment Tonight" and "Oprah" are not included.)
  - Public Affairs: programs that discuss politics, current events, and other topics of public interest, such as "Meet the Press" and "Capital Conversation."
  - Instructional: how-to-programs such as "Your New House" and "Martha Stewart."
  - Children's/Educational: programs, as identified in program guides, designed to further "the educational and informational needs of children 16 years of age and under in any respect, including the child's intellectual/cognitive or social/emotional needs."
  - Religion: paid religious programs.

- Hours and Percentages:
  - For each day of the week, the tables show the amount, in hours, rounded to the nearest ¼ hour, of each category of programming broadcast during a twenty-four hour period[2] by the Belo station named at the top of the chart. The figures are derived from a representative week and based upon published program guide listings.
  - Weekly Total: total number of hours of each category of programming broadcast during the week specified by the Belo station.
  - Weekly Total as Percentage of Total Programming: percentage of each broadcast week (168 hours) devoted to each category of programming.
  - Weekly Total for All Network Affiliates: total hours of each category of programming broadcast during the week for all four network affiliates (ABC, NBC, CBS and FOX) in the market.
  - Weekly Total for All Network Affiliates as Percentage of Total Programming: percentage of each broadcast week of all four network affiliates (672 hours) devoted to each category of programming.
  - Discounted for Commercials: based upon data from a representative Belo station (KHOU-TV), the average amount of commercial matter in each hour of non-entertainment programming is 14.4 minutes, or 24% of each hour. This average figure is applied to all categories of programming, including children's/educational programming, although Belo stations comply with FCC standards for permissible commercial matter in children's programming. The numbers to the right of the "slash" marks have been discounted by that percentage to subtract commercial matter from the totals.[3]

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[1] The numbers in the tables include network, syndicated, and locally-produced programming.

[2] The programming totals for KHNL-TV, Honolulu, and the other network affiliates in the Honolulu market, cover the period from 7 a.m. to 1 a.m.

[3] Religious programming generally does not contain commercials, and consequently, the totals have not been discounted.

WFAA-TV, Dallas-Fort Worth, TX Channel 8, ABC *News, Public Affairs, and Other Non-Entertainment Programming (in hours) for the week beginning November 23, 1997*										Dallas-Fort Worth Network Affiliates (ABC, CBS, NBC, FOX)	
	SUN.	MON.	TUES.	WEDS.	THURS.	FRI.	SAT.	WEEKLY TOTAL / DISCOUNTED FOR COMMERCIALS	WEEKLY TOTAL AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS	WEEKLY TOTAL FOR ALL NETWORK AFFILIATES / DISCOUNTED FOR COMMERCIALS	WEEKLY TOTAL FOR ALL NETWORK AFFILIATES AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS
NEWSCASTS	2.75	8	7.5	8.25	8.25	7.25	2.5	44.5 / 33.82	26.5% / 20.1%	170 / 129.2	25.3% / 19.2%
NEWS/INFORMATION (e.g., news "magazines," morning news programs)	2	4.5	4.5	4.5	4.5	4.5	1	25.5 / 19.38	15.2% / 11.5%	79 / 60.04	11.8% / 8.9%
PUBLIC AFFAIRS	2	-	-	-	-	-	.5	2.5 / 1.9	1.5% / 1.1%	5 / 3.8	0.7% / 0.6%
INSTRUCTIONAL (e.g., how-to programs)	1	-	-	-	1	-	-	2 / 1.52	1.2% / 0.9%	10.5 / 7.98	1.6% / 1.2%
CHILDREN'S/ EDUCATIONAL	-	-	-	-	-	-	4.5	4.5 / 3.42	2.7% / 2.0%	14 / 10.64	2.1% / 1.6%
RELIGION	2.5	-	-	-	-	-	-	2.5 / 2.5	1.5% / 1.5%	4.5 / 4.5	0.7% / 0.7%
TOTAL NON-ENTERTAINMENT PROGRAMMING	10.25	12.5	12	12.75	13.75	11.75	8.5	81.5 / 61.94	48.5% / 36.9%	283 / 215.08	42.1% / 32.0%

KHOU-TV, Houston, TX **Channel 11, CBS** ***News, Public Affairs, and Other Non-Entertainment Programming (in hours) for the week beginning January 4, 1998***										**Houston Network Affiliates** **(ABC, CBS, NBC, FOX)**	
	SUN.	**MON.**	**TUES.**	**WEDS.**	**THURS.**	**FRI.**	**SAT.**	**WEEKLY TOTAL / DISCOUNTED FOR COMMERCIALS**	**WEEKLY TOTAL AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS**	**WEEKLY TOTAL FOR ALL NETWORK AFFILIATES / DISCOUNTED FOR COMMERCIALS**	**WEEKLY TOTAL FOR ALL NETWORK AFFILIATES AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS**
NEWSCASTS	1.5	6.5	7.75	7.75	7.75	7.75	4	43 / 32.68	25.6% / 19.5%	136.5 / 103.74	20.3% / 15.4%
NEWS/INFORMATION (e.g., news "magazines," morning news programs)	2.5	1	1	2	2	1	2	11.5 / 8.74	6.8% / 5.2%	53 / 40.28	7.9% / 6.0%
PUBLIC AFFAIRS	1	-	-	-	-	-	-	1 / .76	0.6% / 0.5%	4.5 / 3.42	0.7% / 0.5%
INSTRUCTIONAL (e.g., how-to programs)	-	.5	1	1	1	1	2	6.5 / 4.94	3.9% / 2.9%	7.5 / 5.7	1.1% / 0.8%
CHILDREN'S/ EDUCATIONAL	3	-	-	-	-	-	1	4 / 3.04	2.4% / 1.8%	15 / 11.4	2.2% / 1.7%
RELIGION	1.5	-	-	-	-	-	-	1.5 / 1.5	0.9% / 0.9%	3 / 3	0.4% / 0.4%
TOTAL NON-ENTERTAINMENT PROGRAMMING	9.5	8	9.75	10.75	10.75	9.75	9	67.5 / 51.3	40.2% / 30.5%	229.5 / 174.42	34.2% / 26.0%

KING-TV, Seattle-Tacoma, WA Channel 5, NBC *News, Public Affairs, and Other Non-Entertainment Programming (in hours) for the week beginning December 6, 1997*										Seattle-Tacoma Network Affiliates (ABC, CBS, NBC, FOX)	
	MON.	TUES.	WEDS.	THURS.	FRI.	SAT.	SUN.	WEEKLY TOTAL / DISCOUNTED FOR COMMERCIALS	WEEKLY TOTAL AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS	WEEKLY TOTAL FOR ALL NETWORK AFFILIATES / DISCOUNTED FOR COMMERCIALS	WEEKLY TOTAL FOR ALL NETWORK AFFILIATES AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS
NEWSCASTS	8	8	8	8	8	8.5	5	53.5 / 40.66	31.8% / 24.2%	147.5 112.1	21.9% / 16.7%
NEWS/INFORMATION (e.g., news "magazines," morning news programs)	3	3	2	2	3	.5	2	15.5 / 11.78	9.2% / 7.0%	50 / 38	7.4% / 5.7%
PUBLIC AFFAIRS	-	-	-	-	-	.5	1.5	2 / 1.52	1.2% / 0.9%	8.5 / 6.46	1.3% / 1.0%
INSTRUCTIONAL (e.g., how-to programs)	.5	.5	.5	.5	.5	1	.5	4 / 3.04	2.4% / 1.8%	9.5 / 7.22	1.4% / 1.1%
CHILDREN'S/ EDUCATIONAL	-	-	-	-	-	3.5	.5	4 / 3.04	2.4% / 1.8%	19.5 / 14.82	2.9% / 2.2%
RELIGION	-	-	-	-	-	-	.5	.5 / .5	0.3% / 0.3%	4.5 / 4.5	0.7% / 0.7%
TOTAL NON-ENTERTAINMENT PROGRAMMING	11.5	11.5	10.5	10.5	11.5	14	10	79.5 / 60.42	47.3% / 36.0%	239.5 / 182.02	35.6% / 27.1%

KXTV, Sacramento, CA Channel 10, ABC *News, Public Affairs, and Other Non-Entertainment Programming (in hours) for the week beginning December 6, 1997*										Sacramento Network Affiliates (ABC, CBS, NBC, FOX)	
	SAT.	SUN.	MON.	TUES.	WEDS.	THURS.	FRI.	WEEKLY TOTAL / DISCOUNTED FOR COMMERCIALS	WEEKLY TOTAL AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS	WEEKLY TOTAL FOR ALL NETWORK AFFILIATES / DISCOUNTED FOR COMMERCIALS	WEEKLY TOTAL FOR ALL NETWORK AFFILIATES AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS
NEWSCASTS	.5	2	6.5	8	8	8	8	41 / 31.16	24.4% / 18.5%	122 / 92.72	18.2% / 13.8%
NEWS/INFORMATION (e.g., news "magazines," morning news programs)	1	3.5	3.5	3.5	4.5	4.5	4	24.5 / 18.62	14.6% / 11.1%	70 / 53.2	10.4% / 7.9%
PUBLIC AFFAIRS	1	1	-	-	-	-	-	2 / 1.52	1.2% / 0.9%	2.5 / 1.9	0.4% / 0.3%
INSTRUCTIONAL (e.g., how-to programs)	-	1.5	.5	.5	.5	.5	.5	4 / 3.04	2.4% / 1.8%	4.5 / 3.42	0.7% / 0.5%
CHILDREN'S/ EDUCATIONAL	3.5	1	-	-	-	-	-	4.5 / 3.42	2.7% / 2.0%	18.5 / 14.06	2.8% / 2.1%
RELIGION	-	-	-	-	-	-	-	-	-	5.5 / 5.5	0.8% / 0.8%
TOTAL NON-ENTERTAINMENT PROGRAMMING	6	9	10.5	12	13	13	12.5	76 / 57.76	45.2% / 34.4%	223 / 169.48	33.2% / 25.2%

KMOV-TV, St. Louis, MO **Channel 4, CBS** ***News, Public Affairs, and Other Non-Entertainment Programming (in hours) for the week beginning December 6, 1997***										**St. Louis Network Affiliates** **(ABC/UPN, CBS, NBC, FOX)**	
	SAT.	**SUN.**	**MON.**	**TUES.**	**WEDS.**	**THURS.**	**FRI.**	**WEEKLY TOTAL / DISCOUNTED FOR COMMERCIALS**	**WEEKLY TOTAL AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS**	**WEEKLY TOTAL FOR ALL NETWORK AFFILIATES / DISCOUNTED FOR COMMERCIALS**	**WEEKLY TOTAL FOR ALL NETWORK AFFILIATES AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS**
NEWSCASTS	4	2	6.5	7	7	6.5	5.5	38.5 / 29.26	22.9% / 17.4%	118.5 / 90.06	17.6% / 13.4%
NEWS/INFORMATION (e.g., news "magazines," morning news programs)	2	3.5	2	3	3	2	2	17.5 / 13.3	10.4% / 7.9%	79 / 60.04	11.8% / 8.9%
PUBLIC AFFAIRS	1	2	-	-	-	-	-	3 / 2.28	1.8% / 1.4%	3.5 / 2.66	0.5% / 0.4%
INSTRUCTIONAL (e.g., how-to programs)	-	.5	-	-	-	-	-	.5 / .38	0.3% / 0.2%	4.5 / 3.42	0.7% / 0.5%
CHILDREN'S/ EDUCATIONAL	3	1	-	-	-	-	-	4 / 3.04	2.4% / 1.8%	18.5 / 14.06	2.8% / 2.1%
RELIGION	-	1.5	-	-	-	-	-	1.5 / 1.5	0.9% / 0.9%	4 / 4	0.6% / 0.6%
TOTAL NON-ENTERTAINMENT PROGRAMMING	10	10.5	8.5	10	10	8.5	7.5	65 / 49.4	38.7% / 29.4%	228 / 173.28	33.9% / 25.8%

KGW-TV, Portland, OR **Channel 8, NBC** ***News, Public Affairs, and Other Non-Entertainment Programming (in hours) for the week beginning November 29, 1997***										**Portland Network Affiliates** **(ABC, CBS, NBC, FOX)**	
	SAT.	**SUN.**	**MON.**	**TUES.**	**WEDS.**	**THURS.**	**FRI.**	**WEEKLY TOTAL / DISCOUNTED FOR COMMERCIALS**	**WEEKLY TOTAL AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS**	**WEEKLY TOTAL FOR ALL NETWORK AFFILIATES / DISCOUNTED FOR COMMERCIALS**	**WEEKLY TOTAL FOR ALL NETWORK AFFILIATES AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS**
NEWSCASTS	8	6.5	8	8.5	8.5	8.5	8.5	56.5 / 42.94	33.6% / 25.6%	148.75 / 113.05	22.1% / 16.8%
NEWS/INFORMATION (e.g., news "magazines," morning news programs)	-	2	3	3	3	2	3	16 / 12.16	9.5% / 7.2%	56 / 42.56	8.3% / 6.3%
PUBLIC AFFAIRS	-	1	-	-	-	-	-	1 / .76	0.6% / 0.5%	5 / 3.8	0.7% / 0.6%
INSTRUCTIONAL (e.g., how-to programs)	1	-	.5	-	-	-	-	1.5 / 1.14	0.9% / 0.7%	11 / 8.36	1.6% / 1.2%
CHILDREN'S/ EDUCATIONAL	2	1	-	-	-	-	-	3 / 2.28	1.8% / 1.4%	15 / 11.4	2.2% / 1.7%
RELIGION	-	-	-	-	-	-	-	-	-	4.5 / 4.5	0.7% / 0.7%
TOTAL NON-ENTERTAINMENT PROGRAMMING	11	10.5	11.5	11.5	11.5	10.5	11.5	78 / 59.28	46.4% / 35.3%	233.25 / 177.27	34.7% / 26.4%